

**ATTACHMENT 7**

**TRAINING PLAN**

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**[40 CFR 270.14(b)(12), 264.16; UAC R315-8-2.7, R315-3-2.5(b)(12)]**

This training plan describes training for facility personnel who work with hazardous waste to ensure compliance with UAC R315-8-2.7. The Ashland training program is directed by personnel who have been trained in hazardous waste management procedures. Ashland's training program includes training on hazardous waste management procedures which are relevant to each position and includes instruction and annual re-training on implementation of the facility Contingency Plan, which contains a description of emergency procedures, equipment, and systems.

In addition to the training described below, employees attend monthly safety meetings, which include topics of training required by Resource Conservation and Recovery Act (RCRA) and Oil Pollution Prevention regulations (i.e., SPCC plan). Additionally, all employees are provided access to training via several different vehicles including group training and either electronic or group training via Ashland's Learning Management System (LMS) intranet system. Ashland's system is further described in Appendix B.

**1.0 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS**  
**[40 CFR 270.14(b)(12), 264.16(a)(1); UAC R315-8-2.6(a)(1)]**

An outline of Ashland's training program is in Table 1.

**1.1 Job Title/Job Description**  
**[40 CFR 270.14(b)(12), 264.16(d)(1) and (2); UAC R315-8-2.6(d)(1) and (2)]**

**Facility Manager/Designated Representative**

The above plant personnel are responsible for:

- directing the safe and efficient operation of the facility
- ensuring compliance with state and federal regulations governing hazardous waste operations at the facility overseeing the maintenance of vehicles and equipment
- training materials handlers/truck drivers in RCRA requirements and safety related issues
- reviewing and signing hazardous waste paperwork
- assisting in determining correct placement of incoming waste
- rejecting waste shipments or activities not in compliance
- conducting inspections of the permitted waste storage areas

The minimum education requirement for this position is a high school diploma and training in hazardous waste management procedures.

**Table 1**  
**ASHLAND TRAINING PROGRAM SUMMARY**

1.	DOT Regulations for Surface Transportation of Hazardous Materials. This program covers shipping papers, packaging, loading, unloading, marking, labeling, and placarding.  Required every 3 years for Facility/Compliance Managers, drivers, and office personnel.
2.	Resource Conservation and Recovery Act of 1976. This program covers regulations for generators, transporters, and treatment, storage, or disposal facilities (TSDFs).  Required annually for all facility personnel.
3.	HAZWOPER. Required by the Occupational Safety and Health Administration (OSHA) for training new employees before they are permitted to engage in hazardous waste operations, then annual refresher training is required.  Required annually for Facility/Compliance Managers, and any others who manage hazardous waste on-site. Includes training on the facility Contingency Plan, emergency response actions, emergency equipment, and decontamination.
4.	Hazard Communication Standard. This program covers Material Safety Data Sheets, labels, and industrial hygiene.  Required for all facility personnel initially and if a new hazard is introduced into the employees' work area.
5.	Incipient Fire-fighting. This program covers the elements of fighting small fires, and the use of fire extinguishers.  Required annually for all facility personnel.
6.	Toxic Substances Control Act, Sections 8C and 8E. This program covers reporting procedures for new hazards, or hazards not previously known.  Required every two years for all facility personnel.
7.	Forklift Training. This program covers the safe operation of forklifts.  Required every three years for Facility/Compliance Managers, Materials Handlers, Truck Drivers, and any others who may operate a forklift.

### **Compliance Manager/Plant Supervisor**

The Compliance Manager is responsible for:

- ensuring compliance with state and federal regulations governing hazardous waste operations at the facility
- reviewing and signing hazardous waste paperwork
- rejecting waste shipments or activities not in compliance
- reviewing samples and waste profile sheets
- coordinating the transportation of waste
- overseeing required training for General Office Clerks

The minimum education requirement for this position is a high school diploma and training in hazardous waste management practices.

### **General Office Clerks**

General Office Clerks are responsible for:

- preparing and filing paper work involving hazardous waste shipments
- maintaining RCRA operating logs, manifests, and land ban certifications
- reviewing and signing hazardous waste paperwork
- reviewing samples and profile sheets
- assisting in determining the correct placement of incoming hazardous waste
- rejecting waste shipments or activities not in compliance
- coordinating the transportation of waste

The minimum education requirement for this position is a high school diploma and training in hazardous waste management procedures.

### **Materials Handlers/Truck Drivers**

Materials Handlers/Truck Drivers are responsible for:

- handling and storing hazardous waste properly, responsible through the Compliance Manager
- ensuring paperwork is complete at time of pick-up or shipment i.e. signatures, dates, total number of pieces, total quantity, transporter numbers in place, etc.
- ensuring that the required documents are maintained with the truck
- maintaining knowledge of the emergency procedures necessary in the event of a hazardous waste spill during transportation or storage of the waste or material

A high school diploma is preferred for this position.

## **1.2 Description of How Training Will be Designed to Meet Actual Job Tasks [40 CFR 270.14(b)(12), 264.16(c) and (d)(3); UAC R315-8-2.7(c) and (d)(3)]**

Job titles, major responsibilities, and education requirements for each position is described above. Introductory and annual training for each position are described below. The names of employees filling each of these job descriptions are maintained at the facility.

### **Facility Manager/Designated Representative**

- Introductory training includes RCRA training, hazardous waste operations (HAZWOPER) training, the facility Contingency Plan, and emergency response procedures.
- Annual training reviews include the subjects above, and training on forklift operation, incipient fire-fighting, and Toxic Substances Control Act (TSCA).

### **Compliance Manager/Plant Supervisor**

- Introductory training includes RCRA training, Department of Transportation (DOT) requirements, HAZWOPER training, an external course in hazardous waste management, and the facility Contingency Plan.
- Annual training reviews include the subjects above, and training on incipient fire-fighting and TSCA.

### **General Office Clerk**

- Introductory training includes RCRA training, the facility Contingency Plan, and on-the-job training on RCRA operating logs, the preparation of manifests, labels, and land-ban certifications.
- Annual training reviews include RCRA regulations, the facility Contingency Plan, incipient fire-fighting, and TSCA.

### **Materials Handlers/Truck Drivers**

- Introductory training includes RCRA training, the facility Contingency Plan, the proper handling and storage of hazardous materials, proper and safe operation of forklifts and/or trucks. Drivers must be knowledgeable of Federal Motor Carrier Safety Regulations, and regulations on manifests, labels, placards, and containers.
- Annual training reviews include all of the above, and training on incipient fire-fighting and TSCA.

Facility personnel are required to complete the RCRA training following initial employment or assignment, and must review it on an annual basis.

### **1.3 Training Director** **[40 CFR 270.14(b)(12), 264.16(a)(2); UAC R315-8-2.7(a)(2)]**

The training program is directed by personnel who have been trained in hazardous waste management procedures. These personnel include the Compliance Manager and the Plant Manager. Their training is acquired through Ashland approved training programs.

The credentials for the training directors are extensive experience in hazardous waste management at the facility, a college degree in business administration, chemistry and/or engineering. The training directors prepare, review, and approve of all training in accordance with hazardous waste management programs conducted at all Ashland Distribution locations.

### **1.4 Relevance of Training to Job Position** **[40 CFR 270.14(b)(12), 264.16(a)(2); UAC R315-8-2.7(a)(2)]**

Employees involved in handling hazardous wastes are required to have the following training in order to prepare them for the operation and maintenance of the facility in a safe manner:

- a) Truck drivers must successfully complete forklift training before being allowed to operate the unit. Proper forklift operation is necessary for transportation of containerized and palletized waste from the loading/unloading area to/from the waste storage areas.
- b) Before hazardous wastes are handled, truck drivers must demonstrate a knowledge and understanding of Federal Motor Carrier Safety Regulations, 49 CFR Parts 390 through 397.
- c) Handlers of hazardous wastes receive on-the-job training from the Compliance Manager. On-the-job training includes, but is not limited to, instruction on the proper packaging of materials, preparation of hazardous waste manifests, labeling of containers, placarding of trucks, and emergency response procedures for hazardous wastes.
- d) Procedures for use and inspection, repair, and replacement of facility emergency equipment, monitoring equipment, and the alarm system are taught to all facility personnel.
- e) Employees are trained in the proper procedures to be followed in the event of a fire, explosion, or spillage incident. These requirements

include, but are not limited to, the proper use of fire extinguishers, employee personal protection, proper incident reporting procedures, and emergency response and evacuation procedures.

- f) Shutdown procedures during a fire, explosion, power outage, pump failure, operational spillage, etc. are fully covered in the employee training protocol.

Personnel who handle hazardous waste receive OSHA-required HAZWOPER training, initially and annually. Training requirements and materials may be updated as necessary to keep them current.

## **1.5 Training for Emergency Response** **[40 CFR 270.14(b)(12), 264.16(a)(3); UAC R315-8-2.7(a)(3)]**

Ashland training is designed to ensure that personnel are able to respond properly to emergencies and that they are familiar with emergency procedures, equipment, and systems. These include procedures for using and inspecting the facility's emergency equipment and communication and alarm systems. Personnel are also trained in the proper responses to fires, explosions, and releases of hazardous wastes to air, soil, or surface waters.

These requirements include the proper use of fire extinguishers, personal protective equipment, proper incident reporting, and responses to specific types of emergencies.

Contingency Plan training covers emergency response procedures including the following specific subjects:

- Communications & alarm systems
- Fire and/or explosion
- Spills or material release
- Prevention of recurrence or spread of fires, explosions, or releases
- Spill Control Plan
- Post emergency equipment maintenance and notification
- Container spills and leakage
- Personal protective equipment

Classroom instruction to meet RCRA requirements is accomplished with Ashland's RCRA training program which includes a RCRA overview and U. S. Environmental Protection Agency (EPA) regulations concerning: hazardous waste identification; hazardous waste category determination; Generator, Transporter, TSDF requirements; manifesting; labeling; record keeping; and LDR notification forms.

Employee training also covers shut-down procedures during fire, spill, or other emergency.

## **2.0 MAINTENANCE OF TRAINING RECORDS/COPY OF PERSONNEL TRAINING DOCUMENTS**

**[40 CFR 270.14(b)(12); 264.16(b), (d)(4), and (e); UAC R315-8-2.7(b), (d)(4), and (e)]**

Facility personnel are required to receive the necessary training within six months after the date of their employment or assignment to the facility, or to a new position at the facility. New employees at the facility may not work in unsupervised positions until they have completed the necessary training. After completion of introductory training, the requirements associated with this attachment are repeated at least annually, and selected areas are reinforced at regular training sessions to ensure a continuous understanding of the job requirements and applicable regulations.

Training records for Clearfield personnel, including records of training for HAZWOPER and the facility Contingency Plan, identifying the employee training type, date and employee signature, are maintained at the facility. An example is included in Appendix A. A training calendar for 2007 is also included in Appendix A. These training records are maintained electronically in the Learning Management System (LMS).

Training records for current personnel will be maintained until closure of the facility. Training records for former employees will be kept for at least three years from the date the employee last worked at the facility.



## **APPENDIX A**

### **TRAINING RECORDS**

## **APPENDIX B**

### **ASHLAND LMS SYSTEM**